

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

<hr/>		)	
TOM BRADY, <i>et al.</i> ,		)	
		)	
Plaintiffs,		)	No. 0:11-cv-00639-SRN-JJG
		)	
v.		)	
		)	
NATIONAL FOOTBALL LEAGUE, <i>et al.</i> ,		)	
		)	
Defendants.		)	
<hr/>		)	

**DEFENDANTS'**  
**EXPEDITED MOTION FOR A STAY PENDING APPEAL**

On April 25, 2011, the Court issued an order granting Plaintiffs' motion for a preliminary injunction barring the NFL and its member clubs from implementing a lockout (the "Order") (Dkt No. 99).

Pursuant to Federal Rule of Civil Procedure 62(c), Defendants National Football League and each of the NFL Clubs respectfully request a stay of the Court's Order pending their expedited appeal of the Order to the United States Court of Appeals for the Eighth Circuit.

In support of this Motion, Defendants rely on the accompanying Memorandum of Law, as well as the briefing, declarations, exhibits, and argument submitted with respect to the motions for preliminary injunction.

Respectfully submitted,

David Boies (*pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
333 Main Street  
Armonk, NY 10504  
(914) 749-8200  
(914) 749-8300 (fax)

William A. Isaacson (*pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Ave., NW  
Washington, DC 20015  
(202) 237-2727  
(202) 237-6131 (fax)

s/Daniel J. Connolly  
Daniel J. Connolly #197247  
Aaron D. Van Oort #315539  
FAEGRE & BENSON LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
(612) 766-7806  
(612) 766-1600 (fax)

Gregg H. Levy (*pro hac vice*)  
Benjamin C. Block (*pro hac vice*)  
COVINGTON & BURLING LLP  
1201 Pennsylvania Ave., NW  
Washington, DC 20004-2401  
(202) 662-6000  
(202) 662-6291 (fax)

*Counsel for the NFL and NFL Clubs*

April 25, 2011